Date: 7/21/2011

Name:
Mr. Steven M. Warren

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Comment

1. I am concerned about "capping" a site with an active watercourse/pond. Has TRC even worked on such a project? It seems to me that there would not be a proper way to engineer such a site unless the watercourse/pond is kept a separate, "free-flowing" entity. Has any landfill closure even been designed over a watercourse/pond?

Response

TRC has worked on projects involving an active watercourse/pond before. The closure plan prepared by TRC on behalf of the City of Stamford addresses this issue. Before the landfill capping proceeds, a new culvert pipe will be installed along Scofieldtown Road to redirect the stream outside the footprint of the landfill. The new culvert pipe will discharge into Poorhouse Brook just upstream of the Scofieldtown Road culvert pipes. The stream will no longer discharge into the pond feature that currently lies within the footprint of the landfill. The existing culvert pipe that traverses directly beneath the landfill will be capped at both ends and abandoned. The area of the existing pond will be converted into a lined stormwater management basin to collect, treat and discharge the onsite surface runoff, thus improving water quality from the site and preventing infiltration. Please refer to Section 5.5 and Figure F of the Landfill Closure Plan for this information.

Date: 8/12/2011

Name:
Betsy Kempner

Email:
kempstones@aol.com

Comment

1. I am a North Stamford resident and I would like to see the Scofieldtown landfill finally closed properly.
   There are too many unknown contaminants present that are still risking the health of all of us who drink well water.
   It is a shame that while one thinks of N. Stamford as a nice area to live, the issue of questionable quality drinking water comes to mind as well. This alone has had a negative effect on our property values. Please help allay continued homeowner speculation and worry regarding this, and do your best to make sure the area is thoroughly and properly closed.

Response

Extensive groundwater and landfill leachate investigations will be performed to evaluate the existing conditions at the Scofieldtown landfill site. If off-site impact emanating from the landfill is determined to be present, then the City may be required to implement a corrective action. The gathered information will also be used to design the landfill closure in a manner that will be protective of human health and the environment. All of the current State of Connecticut regulatory requirements that apply to landfill closure, surface water quality and groundwater quality will be enforced to ensure that the landfill does not pose a future risk to homeowner wells.

Date: 8/11/2011

Name:
North Stamford Concerned Citizens for the Environment (NSCCE)
Karen DeFalco, President

Address:	**City/State/Zip:**
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Comment

1. As discussed previously with yourself and with Associate Director Robert E. Bell, NSCCE strenuously objects to any approvals for the final design and engineering of the landfill closure until after the monitoring process has been completed, and the results have been made public. The solution cannot be determined until the symptoms have been fully diagnosed and reviewed. We request that these monitoring results be made public on a prompt quarterly basis, to be reviewed by residents, NSCCE and interested experts.

Response

The off-site impact evaluation will be a yearlong process of data collection and analysis. The quarterly sampling data sets will be assembled into individual reports for submission to the CTDEEP and the City. In addition, a document that encompasses all four quarters of the results and the seasonal variations will be prepared. This document, with accompanying supporting data and evaluation, will be made part of the public record available at both DEEP and at the City. Sufficient opportunity for public review and comment of this document and recommendations concerning final plans for landfill closure will be made available.

Comment

2. We encourage DEEP to consider the addition of an Ecological Risk Assessment, or at least a scoping study to evaluate whether a full Ecological Risk Assessment might be needed.

Response

The sediment and surface water quality data collected to date by both USEPA and TRC do not suggest an adverse impact attributable to the landfill on the adjoining wetland/stream corridor adjacent to the landfill site (see TRC Environmental Investigation Report dated April 2010). Upon completion of the off-site impact evaluation report the need for ecological risk assessment will be evaluated.

Comment

3. Because the final use of the entire site has not yet been determined, we encourage DEEP to require that all fill brought to the site comply with RDEC standards – even for areas that might be used as a Public Works Yard or as a Recycling Center. Use of I/C DEC fill

will only hamper the possible use of this site.

Response

Final use(s) (including the allocation of the site for public works use and for recreational use) will be determined prior to completion of the closure design for the site. Appropriate controls will be incorporated into the design to ensure that the uses associated with any I/C DEC cover soil used are separate from those requiring the more stringent RDEC cover soil.

Comment

4. We wish to draw your attention to existing wellheads that might be used at minimal cost to help monitor water quality and groundwater levels. Specifically:
    a. The original UConn wellhead is located almost due south of the Hannahs/Scofieldtown Road intersection, and due east of the proposed monitoring well pair "B".
    b. The original Smith House Nursing Facility well in the west wing of that building.
    c. The original Scofield Manor well.

Response

The off-site impact evaluation provides an extensive network of monitoring wells both within the landfill footprint itself as well as the peripheral areas. This network will augment the monitoring wells which were installed in November 2009 as part of the City of Stamford's initial efforts to identify any potential impacts from the landfill on the surrounding aquifer. The new wells must be constructed to comply with regulatory standards for the construction of environmental monitoring wells as outlined in the Connecticut Department of Energy and Environmental Protection's (CT DEEP) Site Characterization Guidance Document in order to ensure that representative and verifiable groundwater samples can be collected. The existing wells noted above in the vicinity of the landfill were not constructed as environmental monitoring wells and therefore were not constructed in a manner that can provide the quality of data needed for the off-site impact evaluation or the subsequent groundwater monitoring program. The off-site impact evaluation plan proposes well clusters consisting of an unconsolidated overburden monitoring well and cased bedrock monitoring well in the vicinity of each of the three wells noted above which will be used to monitor the groundwater quality and groundwater levels in these areas.

Comment

5. We understand that the drainage pipe underneath the landfill is not watertight – that the joints of the concrete culvert are mechanically joined – and suggest that the drainage pipe be completely filled, not just plugged at both ends.

Response

Observation of the discharge from the pipe indicates that landfill leachate is being discharged along with the stream flow. The closure plan calls for plugging both ends of the pipe. The manner in which the pipe will be plugged is an engineering detail that will be addressed during the landfill closure design phase. The method selected for addressing this issue will be handled

in a manner that prevents the pipe from functioning as a conduit for leachate being discharged from both the pipe and the fill material surrounding the pipe near its outlet. Filling the pipe will be considered during the design selection, if plugging or other less costly measures are deemed functionally inappropriate.

Comment

6. We encourage you to include a requirement that some neighborhood residential wells be included in the monitoring process, before, during and post construction of the cap.

Response

As stated in the response to Comment 4 above, since the residential water wells were not constructed with the intention of being used as environmental monitoring wells, they would not be suitable to be used as monitoring points for the off-site impact evaluation or the post-remediation monitoring program. The off-site impact evaluation plan proposes an extensive network of monitor wells both within the landfill footprint itself, as well as, the peripheral areas. The new monitor wells combined with the monitor wells installed in November 2009, will be used to assess and monitor the groundwater below and in the vicinity of the landfill. While many of these monitor wells will be included in the post-remediation groundwater monitoring program, it is likely that some additional monitor wells will need to be installed after the capping of the landfill is complete to replace wells that will necessarily be destroyed during the construction of the cap.

Comment

7. We also wish to draw your attention to additional documentation that helps characterize the historic use of the Scofieldtown Landfill. A City of Stamford factsheet distributed at the July closure meetings states that the landfill "reportedly accepted a combination of municipal solid waste, construction and demolition debris and bulky wastes." This may understate the problem – a 1953 *Sunday Herald* newspaper article (see Attachment I) describes "two open pits maintained for the burning of industrial wastes…from local chemical plants." FOIA requests to the City of Stamford building department and engineering department for as-built drawings or plans of these burn pits were unsuccessful. Such burning of industrial wastes was again documented in 1966 (see Attachment II), and a fire was documented in 1969 (see Attachment III). A Preliminary Assessment/Site Investigation of the site dated November 28, 1995 (see Attachment IV) includes expert statements from Stamford Fire Department Hazmat Officer Frank Docimo, including that "the Site had been used for waste disposal by several companies including Clairol, Raytheon [Machlett Laboratories] and American Cyanamid." The DEEP File Room has extensive records on those companies and chemicals that were used by them.

Response

Groundwater monitoring and seep analysis performed as part of the yearlong off-site impact evaluation will determine if industrial constituents of concern are present. Evaluation of the

groundwater results and leachate impact analysis will be used to recommend appropriate landfill closure/capping measures to address groundwater and surface water impacts from the site.

Comment

8. We believe that additional monitoring work is warranted. The engineering concept suggests that landfill cover soil and wastes will be re-graded – before this material is moved, we need a better understanding of what is being moved, so that appropriate containment can be built in advance of re-grading. For example, the December 2008 Site Reassessment shows RDEC and I/C DEC exceedences at SS-03 along the northern embankment, and at SS-08 along the eastern embankment – both areas that will need significant re-grading under the current engineering concept.

Response

The CTDEEP is aware of the results that are indicated in your comment. It is common practice when landfill closure work is performed that significant waste and surface soil re-grading is required. The CTDEEP will enforce proper management of these materials and the implementation of a well designed sedimentation/erosion control system to prevent the release of polluted materials to the surrounding environment. The CTDEEP will also require that appropriate dust control measures are employed to prevent release of fugitive dust containing polluting substances and other fine particulate matter. The closure plan submitted by the City of Stamford addresses these items and the CTDEEP will require that the final engineering design and specifications incorporate best management practices. Monitoring of surface runoff during construction, if deemed appropriate, will be incorporated into the final plan. The CTDEEP currently regulates stormwater runoff from landfills as part of the General Permit program for an industrial activity. In situations where runoff can come in direct contact with waste materials, the site owner/operator is required to perform surface runoff discharge monitoring in accordance with the General Permit requirements.

Comment

9. We request at least three additional seep analyses along the north-western edge of the landfill, continuing a line as far as the foot of the salt dome. We also request additional sediment testing, including from the center of the man-made sediment pond between the salt dome and the Queen of Peace cemetery. This pond appears to collect seeps and sediment from inside the landfill, even though it is not on City property. We also note that Water Quality Classification maps suggest that this containment pond may need to be reclassified from GA to GB: http://cteco.uconn.edu/map_catalog/maps/town/wtrqualclreview2011/Surface_WQC_Update_Stamford.pdf If the sediment pond was contaminated by the landfill, it may make a great deal of sense to include it as part of the landfill closure.

Response

In accordance with Section 4.1 of the Closure Plan, a comprehensive inspection of the landfill slopes and any nearby low-lying areas will be conducted to identify any groundwater seeps emanating from the landfill. The proposed seep sample locations presented in Figure D of the Closure Plan were intended as preliminary locations based on observations made during the Fall

2009 investigation. Additional seep sample locations may be added based on the results of the visual inspection of the landfill as specified in Section 4.1.The final sample locations will be determined based on these future inspections. Samples will be collected from each area where seepage is observed during each monitoring event. If seepage is detected in the area noted, TRC will collect samples.

With regard to surface water reclassification of the pond, there is insufficient data to assess the need for reclassification. Future data will be evaluated periodically to assess if reclassification is appropriate.

The 2008 USEPA Investigation included two sediment samples collected from the area described within the wetland area upstream of the culvert pipe which conveys the unnamed brook north of the central portion of the landfill footprint beneath an earthen berm. In accordance with Section 3.3 of the Closure Plan, an additional sediment/surface water sample location has been proposed to further assess the sediments in this area.

Comment

10. We suggest an additional sediment sample upstream from the "Community Gardens" to understand local conditions, before any impact from the Gardens. (We also note that several 50-gallon chemical drums and a junked municipal hearse were discovered upstream from the Gardens in January 2009.)

Response

The off-site impact evaluation is focused on the investigation of the landfill and not sources of impacts related to other nearby potential sources of contamination.

Comment

11. We note that the unnamed stream that becomes Poorhouse Brook is at roughly 270 feet above sea level. Monitoring wells installed by TRC in 2009 show that the bedrock is clearly below this level, suggesting that even after installation of a cap, water could leach underneath the geomembrane and into landfill wastes before leaching back out. Specifically, bedrock at MW-1 is at 267 feet ASL, at MW-6 is at 241 feet ASL, and at MW-2 is at 262 feet ASL. The unnamed stream is a wetland that routinely floods during heavy rainstorms and during snowmelt, and want to be sure this is taken into account when designing the edge of the cap, including a possible retaining wall to bedrock.

Response

The current groundwater regime in both the overburden soils and shallow bedrock will be thoroughly assessed as part of the off-site impact evaluation. The effect that groundwater has on the generation of leachate passing through waste material will also be assessed. The groundwater and leachate assessment will include modeling of the post closure leachate generation and the impact on groundwater and surface water. The groundwater levels beneath the landfill are anticipated to drop following capping and rerouting of the stream. The results of the model will be used to design the landfill closure to be protective of human health and the environment and to prevent erosion of the cap and underlying waste material.

Date: 7/18/2011	
Name: Mrs. Victoria J. Preston	
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Comment

1. My concern, in attending this meeting, is the future of the compost facility to Stamford residents. I learned that the leaves recycling program is being discontinued on account of cost: $300,000 to collect leaves in Stamford versus $50,000 income from selling compost to commercial enterprises, does not make economic sense, I would agree. But will Stamford leaves no longer be collected and if they are, will $300,000 still be budgeted for? And where will the leaves be processed?

Response

Details for future management and budgeting of cost for leaf collection and processing will be addressed in the future by the City of Stamford Office of Operations.

	Date: 7/18/2011
Name: Mr. Peter Fortmann	
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Comment

1. It is all about the WELLS and safe drinking water. My comment is that any closure plan should lead to clean well water in the surrounding area.

Response

The off-site impact evaluation that will be completed before the final closure design will determine what impact, if any, the landfill may have on groundwater quality affecting nearby private homeowner wells. If there is any correlation between the landfill and the water quality in nearby wells, then measures will be incorporated into the landfill closure to address these concerns. Based on preliminary work performed by TRC documented in the April 2010 Report, it is unlikely that the landfill has any impact on the water quality in the nearby homeowner wells. If this preliminary data is confirmed by the data to be collected during the off-site impact evaluation, then the landfill closure will have no impact on improving water quality in the nearby wells. There may be other multiple sources of historical contamination in the area that are affecting homeowner well water quality that are not within the scope of this landfill closure project.